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September 10, 2021

VIA ECF

Honorable Alison J. Nathan, U.S.D.J.
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: Mateo et al v. DJKM Lane Food Corp et al., 1:21-cv-04518-AJN

Your Honor:

This office represents the Plaintiff in the above referenced matter. I write to respectfully request an adjournment of the initial conference currently scheduled for September 17, 2021 at 3:30 P.M. (ECF Doc. No. 10), and an extension of the deadline to file a status letter and proposed case management plan by today, September 10, 2021 (ECF Doc. No. 10). This is the Plaintiff's first request for an adjournment and extension.

The reason for this request is that Defendants have yet to appear in this case. I have held informal communications with Defendants' counsel and it is my understanding that they will file a notice of appearance soon, and I advised them to do so. Moreover, today Plaintiff filed the First Amended Complaint, in which we exchanged the corporate defendant from DJKM Lane Food Corp to ABC Five Wings Inc.

In light of the above, I respectfully request that the initial conference be adjourned 30 days, which will give Plaintiff enough time to serve the new corporate Defendant. At this time, there are no further conferences or deadlines scheduled in this matter. **SO ORDERED.**

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Catalina Sojo _____
Catalina Sojo, Esq.
MICHAEL FAILLACE & ASSOCIATES, P.C.
Attorneys for Plaintiff

Initial conference will be scheduled
for Friday, October 22, 2021 at
3:30 p.m. A status letter and
proposed case management
plan should be submitted on
Friday, October 15, 2021.



9/13/2021

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